

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

vs.

CASE NO. 15 CR 765/PAC

EFRAIN A. CAMPOS FLORES, et. al.,  
Defendant.

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February 25, 2016

BY ECF

Hon. Paul A. Crotty  
United States District Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Re: U. S. v. Campo Flores, et.al., 15 CR 267/PAC

Dear Honorable Court:

I am respectfully writing to this Honorable Court to request an adjournment of the February 29, 2016 at 12:00pm status conference in the above referenced matter. Counsel for Mr. Campos Flores requests this adjournment in order to continue reviewing the Rule 16 discovery that has been provided by the government. Counsel for Mr. Campos Flores was assigned to this matter on December 14, 2015, after the initial distribution of discovery from the government to defendants. Defendants received a second disclosure of discovery on January 8, 2016 which contained search warrant applications and orders, more audio recordings and draft translations.

Counsel would respectfully request this Honorable Court grant this request to allow counsel an opportunity to continue the review of the Rule 16 discovery. Counsel is in need of a Venezuelan translator in order to continue his review of the discovery and also needs additional time to review the second disclosure and its' contents.

There have been no prior adjournment request made by Mr. Campos Flores in this matter, although Mr. Campos Flores is aware that there has been a prior request, for an adjournment, made by co-defendant, which defendant did join. I have spoken with counsel for the co-defendant Mr. Franqui Flores De Freitas, Mr. Vincent Southerland, Esq. who joins in counsel' request for an adjournment. I have also spoken with Assistant United States Attorney, Emil Bove, counsel for the Government, who has consented to the requested adjournment. Defendants consent to the waiver of speedy trial time from February 29<sup>th</sup> to March 29, 2016 or any date thereafter selected by the Court. Counsel for Mr. Campos Flores wishes to inform the Court that he will be unavailable the week of April 4<sup>th</sup> 2016 because of prior medical reasons, but can be available any date thereafter.

Respectfully Submitted,

/s/ Kafahni Nkrumah ,

KAFAHNI NKRUMAH, Esq.

Counsel for Mr. Campos Flores

NKRUMAH LAW P.L.L.C.

20 Vesey St., ste. 400

New York, NY 10007

(917) 722 – 2430 (o)

(718) 496 – 8744 (o)

[kankrumahesq@aol.com](mailto:kankrumahesq@aol.com)